

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

COLLEEN O'DONNELL,)	
)	
Plaintiff,)	
)	Civil Action No: 04-40190-FDS
v.)	
)	
ALBERTO R. GONZALES, ATTORNEY)	
GENERAL, U.S. DEPARTMENT)	
OF JUSTICE,)	
)	
Defendant.)	

JOINT MOTION FOR EXTENSION OF PRETRIAL DEADLINES

The parties in the above-captioned matter respectfully move the Court to extend the remaining deadlines established by the Court's November 22, 2005 order for a period of thirty (30) days. Specifically, the parties request that the Court extend the deadline for expert depositions, which is currently March 3, 2006, to April 3, 2006. Also, the parties request that the Court extend the deadline for dispositive motions, which is currently March 31, 2006, to May 1, 2006. The parties state that they have been unable to schedule the expert depositions to occur before the March 3, 2006 deadline due to the busy schedules of the experts. Plaintiff's expert is available for deposition on March 3, 2006; and Defendant's expert is available for deposition on March 14, 2006. Accordingly, in order for the parties to conduct the expert depositions without violating the Court's order and to timely file dispositive motions, the parties request that the remaining pre-trial deadlines be continued for thirty (30) days.

COLLEEN O'DONNELL,

ALBERTO R. GONZALES,
Attorney General, U.S.
Department of Justice

By her attorney,

By his attorney,

MICHAEL J. SULLIVAN
United States Attorney

/s/ Dawn D. McDonald
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Dated: February 21, 2006